## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Petition of Verizon New England Inc. for	)
Arbitration of an Amendment to Interconnection	
Agreements with Competitive Local Exchange	) D.T.E. 04-33
Carriers and Commercial Mobile Radio Service	
Providers in Massachusetts Pursuant to Section	
252 of the Communications Act of 1934, as	
Amended, and the Triennial Review Order	

## **JOINT MOTION FOR EXTENSION OF TIME**

Verizon New England, Inc. ("Verizon MA"), Conversent Communications of Massachusetts, Inc., the Competitive Carrier Coalition<sup>1</sup> and the Competitive Carrier Group<sup>2</sup> (the "Parties") hereby respectfully request that the Department of Telecommunications and Energy (the "Department") grant an extension of time, until May 26, 2006, to file a final Amendment incorporating the determinations made in the Order on Compliance issued by the Department on May 5, 2006 in the above-captioned proceeding and for Verizon MA to file amendments to its tariff as required by that order.

Good cause exists for granting this extension.<sup>3</sup> Under the Order on Compliance, a conforming Amendment and tariff revisions would be due today, May 22, 2006. The parties have worked diligently to develop a final Amendment that reflects the Department's determinations in the Order on Compliance and have narrowed the scope of their dispute to two

The Competitive Carrier Coalition includes: DSLNet Communications, LLC; RCN-BecoCom LLC and RCN Telecom Services of Massachusetts, Inc.

The following members of the Competitive Carrier Group are parties to this Joint Motion: A.R.C. Networks Inc. d/b/a InfoHighway Communications Corporation, DIECA Communications Inc. d/b/a Covad Communications Company and XO Communications Services, Inc. (formerly XO Massachusetts, Inc. and Allegiance Telecom of Massachusetts, Inc.).

<sup>&</sup>lt;sup>3</sup> 220 C.M.R. ¶ 1.02(5) (For good cause shown, the Department or the hearing officer has discretion to extend time limits prescribed or allowed by its Procedural Rules).

sub-sections of the Amendment. With the short extension sought herein, the parties are confident they will be able to resolve the remaining issues and file a final conforming Amendment by May 26. Verizon MA will file revisions to its tariff at that time.

WHEREFORE, the Parties respectfully request that the Department grant this Joint Motion for Extension of Time.

Respectfully submitted,

/s/Alexander W. Moore

Bruce P. Beausejour Alexander W. Moore Verizon New England, Inc. 185 Franklin St. – 13<sup>th</sup> Floor Boston, Massachusetts 02110-1585 (617) 743-2265

Gregory M. Kennan Conversent Communications of Massachusetts, Inc. 24 Albion Road, Suite 230 Lincoln, RI 02865 (401) 834-3326

Russell M. Blau
Philip J. Macres
BINGHAM MCCUTCHEN LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 373-6000 (telephone)
Counsel to the Competitive Carrier Coalition

Genevieve Morelli
Brett Heather Freedson
KELLEY DRYE & WARREN LLP
3050 K Street, N.W., Suite 400
Washington, D.C. 20007
(202) 342-8400 (telephone)
Counsel to the Competitive Carrier Group

Dated: May 22, 2006